

SHER TREMONTE LLP

Yonatan Y. Jacobs

Erica A. Wolff (admitted *pro hac vice*)

Michael Tremonte (admitted *pro hac vice*)

90 Broad Street, 23rd Floor

New York, New York 10004

(212) 202-2600

YJacobs@shertremonte.com

EWolff@shertremonte.com

MTremonte@shertremonte.com

Attorneys for Defendant Sean Combs

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

LIZA GARDNER,

Plaintiff,

Case No. 24-CV-07729

-against-

SEAN COMBS, et al.

Defendants.

**PROPOSED ORDER GRANTING DEFENDANT SEAN COMBS'
MOTION TO DISMISS COUNTS I-III, X OF THE
AMENDED COMPLAINT**

THIS MATTER having been brought before the Court upon Defendant Sean Combs' Motion to Dismiss with prejudice all causes of action asserted against him in the Amended Complaint (Counts I-III, X of the Amended Complaint) Pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6) (the "Motion"), and the Court having considered the papers submitted in support of and in opposition to

the Motion, and the arguments of counsel, and for good cause having been shown:

IT IS on this _____ day of _____, 2025 hereby:

ORDERED that the Motion is GRANTED in its entirety;

ORDERED that the Amended Complaint is hereby DISMISSED WITH PREJUDICE only as to Defendant Sean Combs.

Dated: This _____ day of _____, 2025.

Honorable Leo M. Gordon
U.S. Court of International Trade
(sitting by designation in the U.S.
District Court of the District of New
Jersey)